

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GLOBAL IP SOLUTIONS, INC.,

Plaintiff,

vs.

DELTATHREE, INC.,

Defendant.  
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: 07 CV 7631 (DCP)  
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: **NOTICE OF MOTION FOR**  
: **STAY OF DISCOVERY**  
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PLEASE TAKE NOTICE that upon the Defendant's Memorandum of Law in Support of its Motion for a Stay of Discovery, the Declaration of Dominic J. Picca dated February 25, 2008, together with all pleadings and proceedings on file in this matter, Defendant Deltathree, Inc., through its undersigned counsel, will move this Court before the Honorable Donald C. Pogue, Judge for the United States Court of International Trade sitting by designation, at the U.S. Court of International Trade, Courtroom Number 2, on a date to be determined by the Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, for an Order granting a stay of discovery pending disposition of Deltathree's Motion for Partial Summary Judgment.

Dated: February 25, 2008

MINTZ LEVIN COHN FERRIS  
GLOVSKY AND POPEO, P.C.

By: 

Dominic J. Picca  
Seth R. Goldman

Chrysler Center  
666 Third Avenue  
New York, New York 10017  
212-692-6845  
*Attorneys for Defendant deltathree, Inc.*

To: Luke A. Connelly, Esq.  
Edward C. Wipper, Esq.  
WINSTON & STRAWN, L.L.P.  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 294-6700  
Facsimile: (212) 294-4700

Jonathan M. Cohen (admitted *pro hac vice*)  
Krista M. Enns (application for *pro hac vice* pending)  
101 California Street, Suite 3900  
San Francisco, CA 94111  
Telephone: (415) 591-1000  
Facsimile: (415) 591-1400

Attorneys for Plaintiff Global IP Solutions, Inc.

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